



State of New Jersey

CHRIS CHRISTIE
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DEPARTMENT OF ENVIRONMENTAL PROTECTION

BOB MARTIN
Commissioner

KIM GUADAGNO
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Bureau of Case Management
Mail Code 401-05F
P.O. Box 420
Trenton, NJ 08625-0420
Phone #: 609-633-1455
Fax #: 609-633-1439

Alison A. Hess, C.P.G.
Project Manager
United States Environmental Protection Agency (USEPA) Region 2
290 Broadway, 19th Floor
New York, NY 10007-1866

December 19, 2014

Re: Standard Chlorine Chemical Company (SCCC) Site
1015 to 1035 Belleville Turnpike
Town of Kearny, Hudson County
SRP PI# G000001583
Activity Number Reference: RPC000001

Dear Ms. Hess:

The New Jersey Department of Environmental Protection (NJDEP) has completed its review of the December 2014 Baseline Human Health Risk Assessment Report for the Standard Chlorine Chemical Company (SCCC) site. The NJDEP reviewed the above mentioned document in accordance with its guidance and policy, and provides the following comments and/or recommendations for your consideration.

Comments

1. Please be advised that the NJDEP does not utilize baseline risk assessments to determine whether remediation is needed on a site. The need for remediation is based on exceedances of NJDEP's Soil Remediation Standards and other media standards NJAC 7:26D) as well as conformance to the Technical Requirements (NJAC 7:26E). This risk assessment was reviewed, in accordance with standard EPA guidance, including USEPA's Risk Assessment Guidance for Superfund, Vol. I, 1989 (RAGS). Therefore, while the NJDEP has provided comments on the risk assessment, NJDEP does not require such a risk assessment and will base its remediation determination on NJDEP's policies and procedures.

2. A deed notice and an approved Remedial Action Permit for Soil will be needed in any areas where contaminants are present in concentrations above NJDEP's Residential Direct Contact Soil Remediation Standards (RDCSR). Similarly, all areas where contaminants are present in concentrations above NJDEP's Non-Residential Direct Contact Soil Remediation Standard (NRDCSR) must be detailed by contaminant and contaminant concentration and addressed in accordance to the NJDEP's policies and procedures. The same applies to contaminants with screening levels. The Impact to Ground Water pathway must also be addressed.

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3. The results of the risk assessment are overall acceptable, however the NJDEP bases its review on adherence to the NJDEP Soil Remediation Standards and Technical Requirements, NJAC 7:26E.

4. While the site has several Interim Remedial Measures (IRM) in place, and a slurry wall and steel sheet pile wall separates the site from the Hackensack River, it is imperative that the site be investigated as a potential source of contamination to the Hackensack River.

5. Also, comments provided in NJDEP's October 21, 2014 letter to the USEPA are still applicable.

If you have any questions regarding this matter, you may contact me at (609) 633-1448 or by email at jay.nickerson@dep.nj.gov.

Sincerely,



Jay Nickerson
Bureau of Case Management, Site Remediation Program
New Jersey Department of Environmental Protection

cc. Jay Nickerson, BCM, NJDEP
Steve Byrnes, BEERA, NJDEP
David Van Eck, BGWPA, NJDEP
Swati Toppin, ETRA, NJDEP